

CENTENNIAL COMMUNICATIONS

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November 2, 2007

Kris Monteith, Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW
Room 7-C723
Washington, DC 20554

Fred Campbell, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Nineteenth Quarterly Report of
Centennial Communications Corp. on E911 Compliance**

Dear Ms. Monteith and Mr. Campbell:

Pursuant to the FCC's *Order to Stay* issued in CC Docket No. 94-102,¹ Centennial Communications Corp. ("Centennial") hereby files this nineteenth Quarterly Report detailing our progress in deploying Phase I and Phase II enhanced 911 ("E911") service in our markets. Centennial filed its last quarterly progress report on August 1, 2007. Because Centennial provides CMRS service both in and outside of the continental United States, this report is divided into two sections -- the first explaining the status of Phase II E911 deployment in Puerto Rico and the U.S. Virgin Islands, and the second part reports on Phase II E911 deployment in our domestic markets. In addition, we are attaching the Excel spreadsheet detailing our E911 implementation status.²

I. Puerto Rico/U.S. Virgin Islands

Centennial Puerto Rico License Corp., a subsidiary of Centennial, holds the B block broadband PCS license for MTA 25 – Puerto Rico/US Virgin Islands.

¹ FCC 02-210, released July 26, 2002.

² See *Public Notice, Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation*, DA 03-1902, released June 6, 2003.

Although Centennial initially deployed a network-based solution to effectuate E911 service in Puerto Rico, Centennial has since initiated a complete upgrade of its system there. As part of that overhaul, Centennial has upgraded from Lucent to Nortel switches, effectively replacing its entire network. Consequently, Centennial necessarily switched from a network-based to a handset-based solution for the provision of E911 services, thus potentially increasing the overall system reliability and accuracy with which subscribers can be located in an emergency, through use of GPS-enabled devices in individual handsets.

Centennial provides both Phase I and Phase II E911 service on Puerto Rico. With respect to the switch to a handset-based solution, Centennial worked closely with the PSAP in Puerto Rico to make sure that the PSAP's needs were met as soon as practicable. Significantly, Centennial committed to maintaining its network-based E911 solution, concurrent with adapting to a handset-based solution, until December 31, 2006. Centennial's GPS-capable handset penetration rate currently is 99%.

Centennial also provides service to the U.S. Virgin Islands of St. Croix and St. Thomas under its B Block license for MTA 25. Each island is served by a single PSAP; however at this point, neither PSAP has made a request to Centennial for either Phase I or Phase II E911 service.

Domestic Markets

Through five different subsidiaries,³ Centennial now holds licenses to provide digital cellular and PCS service in 39 markets in the Midwest and Southern United States. Centennial provides CMRS in the following six states: Indiana, Louisiana, Michigan, Mississippi, Ohio and Texas. Centennial utilizes both TCS and Intrado as its E911 partners and has chosen a network-based solution offered by Andrew Corporation to deploy Phase II E911 in its domestic markets.

Phase I Service – Centennial continues to make significant progress initiating Phase I service to PSAPs. To date, we have initiated Phase I E911 service to 156 PSAPs in our domestic markets. As we have previously reported, Centennial continues to receive PSAP requests for Phase I E911 service and we continue to implement Phase I service as valid requests are received. Phase I E911 service has been fully deployed in our existing Indiana, Michigan and Texas markets. To date, we have received four valid requests for Phase I E911 service from PSAPs in the

³ Baucse Communications of Beaumont, Inc., Centennial Michiana License Company LLC, Centennial Southeast License Company LLC, Elkhart Metronet, Inc. and Lafayette Cellular Telephone Company.

state of Ohio. Since the filing of our last report, Phase I service has been initiated to the PSAP in West Carroll Parish, Louisiana. Finally, we are working on implementing two Phase I requests - for Tippecanoe County, IN and Van Wert County in Ohio.

Phase II Service - We are implementing Andrew Corporation's "Geometrix" network overlay solution for E911 Phase II compliance in our domestic markets. Since the filing of our last quarterly report, Centennial has activated three new PSAPs to Phase II compliance (Delaware, Indiana, Ogemaw, Michigan and Winn Parish, Louisiana). In total, we have integrated ninety-two PSAP markets into a "Live" status, and we have ten markets in various stages of the implementation process. Over the past three months, we have received three new requests for Phase II service (St. Mary and Vermillion Parishes in Louisiana and Van Wert County in Ohio).

As noted above, Centennial has finally resolved the deployment difficulties we experienced in Ogemaw County, Michigan, and Phase II service was initiated on August 1, 2007.

Centennial has successfully integrated all Texas PSAPs to Phase II status that have requested Phase II service. Presently, we have two pending Phase II E911 service request for Ohio (Van Wert and Williams Counties) and no pending Phase II requests from PSAPs in Mississippi. Finally, Centennial has pending requests from PSAPs in Fayette, Franklin, Newton and Randolph Counties in Indianan and Beauregard, Madison St. Mary and Vermillion Parishes in Louisiana. Centennial continues to work cooperatively with PSAPs when we encounter issues that result in delays to the previously-negotiated mutually acceptable deployment dates (such as Franklin County, Indiana).

In sum, Centennial is presently in compliance with all applicable Phase II deployment benchmarks, either through meeting the six-month deadline, or negotiating mutually acceptable alternative deployment dates. Phase I & II implementation remain a high priority with Centennial for each of the PSAPs in its domestic markets. Centennial will continue to work cooperatively with PSAPs to deliver the requested service in a timely and efficient manner.

III. Affidavit

I hereby declare under penalty of perjury that the information provided in this response is true and accurate to the best of my knowledge, information and belief.

Kris Monteith
Fred Campbell
November 2, 2007
Page 4

If you have any questions regarding this report, or require additional information, please contact me.

Sincerely,

/s/ William L. Roughton, Jr.

William L. Roughton, Jr.
Vice President, Legal and Regulatory

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Kris Monteith
Fred Campbell
November 2, 2007
Page 5

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